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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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DEC 19 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of:)
Federal-State Joint Board)
on Universal Service)

CC Docket No. 96-45

COMMENTS
OF THE
NATIONAL EMERGENCY NUMBER ASSOCIATION

The National Emergency Number Association ("NENA") hereby responds to the FCC's invitation¹ to comment on the Recommended Decision of the Federal-State Joint Board in the captioned proceeding, FCC 96J-3, released November 8, 1996.

NENA has urged steadfastly that access to 9-1-1 emergency calling services be included in those core services eligible for universal service funding ("USF") support mechanisms under Section 254(c)(1)(A) of the Communications Act. We are gratified that the Joint Board recommends their inclusion. We understand that the recommendation as to "enhanced" 9-1-1 ("E9-1-1") is for support of the telecommunications path between the caller and the Public Safety Answering Point ("PSAP") to which the call is selectively routed, and not for the capital or operating expenses of PSAPs -- in light of other sources for meeting such expenses. (Recommended Decision, ¶51)

NENA also is pleased that so-called "touchtone" or DTMF signalling (or "its functional digital equivalent") is recommended for inclusion. This is

¹ Public Notice, DA 96-1891, released November 18, 1996. Time for comment was extended by three days, to December 19, 1996.

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an important means of speeding calls where seconds saved may save lives
and property in emergencies.

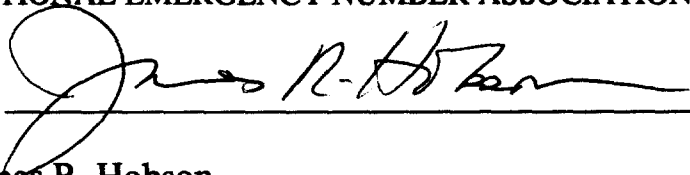
The Commission should ratify the Joint Board's Recommended
Decision in all the elements discussed above.

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Respectfully submitted,

NATIONAL EMERGENCY NUMBER ASSOCIATION

By



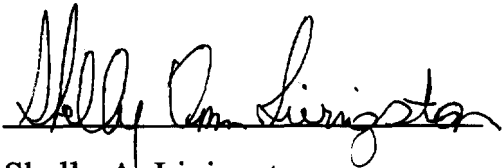
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December 19, 1996

ITS ATTORNEY

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of December, 1996 a copy of the foregoing COMMENTS OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION was served via first class mail upon all members of the Federal-State Joint Board.


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